

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

GREG ABBOTT, in his capacity as
GOVERNOR OF THE STATE OF TEXAS,
and THE STATE OF TEXAS,

Defendants.

Case No. 1:23-cv-00853-DAE

The United States' Exhibit List

The United States submits its Exhibit List pursuant to Western District of Texas Local Rule 16(f)(4). The list includes those exhibits which the United States expects to offer as well as those that the United States may offer if the need arises. Those that the United States may offer if the need arises are marked with an asterisk.

Ex. No.	Exhibit Name
G-1	7/24/23 Declaration of Abraham Garcia
G-2	Garcia Decl. Ex. 1 Photo 1
G-3	Garcia Decl. Ex. 1 Photo 2
G-4	Garcia Decl. Ex. 1 Photo 3
G-5	Garcia Decl. Ex. 2 Photo 1
G-6	Garcia Decl. Ex. 2 Photo 2
G-7	Garcia Decl. Ex. 2 Photo 3
G-8	7/25/23 Declaration of Mario Gomez
G-9	Gomez Decl. Ex. A Notes
G-10	Gomez Decl. Ex. A Schematic
G-11	Gomez Decl. Ex. B Photo 1
G-12	Gomez Decl. Ex. B Photo 2
G-13	Gomez Decl. Ex. B Photo 3
G-14	Gomez Decl. Ex. C Photo 1

G-15	Gomez Decl. Ex. C Photo 2
G-16	Gomez Decl. Ex. C Photo 3
G-17	Gomez Decl. Ex. C Photo 4
G-18	Gomez Decl. Ex. D Photo 1
G-19	Gomez Decl. Ex. D Photo 2
G-20	Gomez Decl. Ex. D Photo 3
G-21	7/26/23 Declaration of Jason Owens
G-22	7/25/23 Declaration of Jennifer Pena
G-23	7/25/23 Declaration of Justin Peters
G-24	7/24/23 Declaration of Hillary Quam
G-25	7/25/23 Declaration of Joseph Shelnutt
G-26	Shelnutt Decl. Photo 1
G-27	Shelnutt Decl. Photo 2
G-28	7/24/23 Declaration of Brandy Parker*
G-29	Parker Decl. Ex. Navigability Determination*
G-30	8/14/23 Declaration of Jennifer Pena
G-31	Pena Ex. 1 Coordinates
G-32	Pena Ex. 2 Schematic
G-33	8/16/23 Declaration of Joseph Shelnutt
G-34	Shelnutt Ex. A Navigability Determination
G-35	Shelnutt Ex. B Navigability Study
G-36	8/15/23 Declaration of Hillary Quam
G-37	Quam Ex. A Transcript
G-38	8/13/23 Declaration of Evelio Siller
G-39	Siller Decl. Att. 1 Photo
G-40	Siller Decl. Att. 2 Photo
G-41	Siller Decl. Att. 3 Photo
G-42	Siller Decl. Att. 4 Photo
G-43	1848 Treaty with the Republic of Mexico, Article VII*
G-44	1853 Treaty with Mexico, Article IV*
G-45	23 Stat. 29 (1884)*
G-46	42 Stat. 1482 (1923)*
G-47	26 Stat. 495 (1890)*
G-48	26 Stat. 502 (1890)*
G-49	<i>Debates and Other Proceedings of the Convention of Virginia*</i>
G-50	1970 Treaty to Resolve Pending Boundary Differences and Maintain the Rio Grande and Colorado River as the International Boundary*

G-51	1944 Treaty Between the United States and Mexico*
G-52	7/27/23 IBWC Photo*
G-53	Retencion de Arrastres*
G-54	8/19/23 IBWC Photo 1 of Barrier*
G-55	8/19/23 IBWC Photo 2 of Barrier*
G-56	8/19/23 IBWC Photo 3 of Barrier*

The United States reserves the right to offer additional exhibits for impeachment, or as necessary for rebuttal or to refresh a witness's recollection. Additionally, the United States reserves the right to supplement this list and introduce additional exhibits from facts discovered after the parties' exchanged exhibits on August 19, 2023. The United States cross-identifies all exhibits used or identified by Defendants and reserves the right to introduce any such exhibits.

Respectfully submitted,

Dated: August 21, 2023

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